

# Exhibit B

**IN THE FIRST CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE  
TWENTIETH JUDICIAL DISTRICT**

IAN LUCAS,

Plaintiff,

v.

VANDERBILT UNIVERSITY, and  
VANDERBILT UNIVERSITY SCHOOL  
OF NURSING.

Defendants.

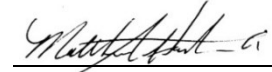
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Case No. 24c2481

**NOTICE OF REMOVAL OF ACTION TO FEDERAL COURT**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, on November 15, 2024, defendants Vanderbilt University and Vanderbilt University School of Nursing (together “Vanderbilt”)<sup>1</sup> in the above-captioned action filed a Notice of Removal (with attachments thereto) with the Clerk of the United States District Court for the District of Tennessee (Nashville). A Copy of the Notice is attached hereto as Exhibit 1 (without its respective attachments).

Respectfully submitted,



Kevin C. Klein, BPR No. 023301  
Matthew “JP” Horton II, BPR No. 038247  
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*Attorneys for the Defendant*

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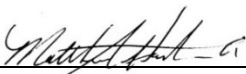
<sup>1</sup> Vanderbilt University School of Nursing is not a distinct entity from Defendant Vanderbilt University. Insofar as Plaintiff’s decision to name Vanderbilt University School of Nursing as a separate Defendant requires the School of Nursing to join in this Notice of Removal, the School of Nursing does so.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Notice of Removal has been sent via e-mail to the following individuals on November 15, 2024:

Ian Lucas  
PMB 61  
Elizabethtown, North Carolina  
28337  
ian.h.lucas@protonmail.com

*Plaintiff Pro Se*

  
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Matthew "JP" Horton II